IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

PETER NICHOLAS DECONZO : BANKRUPTCY CASE NUMBER

DONNA C. DECONZO aka DOMINICA : Case No.: 5:19-bk-01904-RNO

DECONZO

<u>Debtors</u> : CHAPTER 13

NATIONSTAR MORTGAGE LLC d/b/a MR.:

COOPER as servicer for WELLS FARGO : BANK, NATIONAL ASSOCIATION, :

AS TRUSTEE FOR LEHMAN

MORTGAGE TRUST MORTGAGE PASS-THROUGH

CERTIFICATES, SERIES 2006-9

Movant : 11 U.S.C. S 362

v.

PETER NICHOLAS DECONZO DONNA C. DECONZO aka DOMINICA

DECONZO

Debtors/Respondents

CHARLES J. DEHART, III, Trustee

Additional Respondent

DEBTORS' RESPONSE TO MOTION OF NATIONSTAR MORTGAGE
LLC D/B/A MR. COOPER AS SERVICER FOR WELLS FARGO
BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR LEHMAN
MORTGAGE TRUST MORTGAGE PASS-THROUGH CERTIFICATES,
SERIES 2006-9 FOR RELIEF FROM THE AUTOMATIC STAY UNDER
SECTION S362(d)

And now come the Debtors, Peter Nicholas DeConzo and Donna C. DeConzo, a.k.a. Dominica DeConzo, by and through their undersigned counsel, and hereby respond to the Motion as follows:

1-6. Admitted

7-13. Denied. To the contrary Debtor has made payments before and after the filing of this motion.

Wherefore, Debtors pray that the Motion be denied, that they be given an opportunity to provide adequate protection as offered, and for such other relief as is just and equitable.

Respectfully submitted,

Ronald V. Santora, Esq.